

U.S. DISTRICT COURT  
DISTRICT OF VERMONT  
FILED

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STATE OF VERMONT

UNITED STATES DISTRICT COURT  
FEDERAL DISTRICT COURT ACTION

DISTRICT OF VERMONT  
BOX 2

CLERK

DEPUTY CLERK

JOSHUA MANY

V.

VERMONT DEPARTMENT OF CORRECTIONS  
CENTURION HEALTH CARE

FEDERAL CIVIL RIGHTS COMPLAINT ACTION

NOW COMES, Joshua Many, Pro-Se, and pursuant to the Federal Rules of Civil Procedure, 42 U.S.C., 1983, and hereby brings this action against the Vermont Department of Corrections, and Centurion Helath Care Systems.

CAUSE OF ACTION

Petitioner is incarcerated in the Vermont Department of Corrections, and has ben at all times during pendancy of the instant issues herein.

Centurion and the Department at all times during Petitioners confinement have been and are responsible for his safety and Health Care.

Petitioner became incarcerated on 5/30/2017. Petitioner had an existing health issue after being shot with a shotgun just prior to arrest.

On 7/2/2017, petitioner submitted a healthcare request to address

issues of pain and lead pellets in his leg and hip area. No substantiative action was taken.

On 7/28/18, after a lengthy good faith effort on his part, and with condition becoming more painful, petitioner filed a grievance on the medical issue.

On 7/28/2018, petitioner filed a grievance 2, addressing same issue.

On 8/9/2018, Petitioner submitted an additional medical request complaining of pain related to the instant issue.

On 8/20/2018, Petitioner filed a grievance 3, on the issue.

On 9/22/2018, Petitioner, filed a grievance 5, appeal to the director of health service .

On 10/19/2018, the Department responded needing an extension of time to obtain records.

On 11/7/2018, petitioner's appeal was sustained and he was to see an outside provider for medical care. As of this writing no outside appointment has occurred and petitioner continues to suffer pain and increasing symptoms. Line level actions have been unhelpful or productive.

Petitioner has exhausted all remedies and seeks intervention from the Honorable Court.

#### RELIEF

Accept jurisdiction of the instant matter.

Order an immediate hearing.

Appoint Pro-Bono counsel.

Grant Leave to ammend.

Order all other things in the interest of justice.

Find the Vermont Department of Corrections and Centurion to be acting in collusion to deny petitioner line level health care.

Order immediate medical injunction pending civil litigation and adjudication of the instant matter.

Find petitioner may ammend and seek monetary damages at the time of the ammendment when more facts are clear and the parties responsible for denial of basic medical care are clearly named.

Dated this 22nd, day of January, @ Springfield, Vermont.

Respectfully Submitted,

Joshua Many  
Pro-Se, Petitioner